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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

) Case No. 07-5944-SC

) MDL No. 1917

This Document Relates to:

Electrograph Sys., Inc. v. Hitachi, Ltd.,
No. 11-cv-01656;

Electrograph Sys., Inc. v. Technicolor SA,
No. 13-cv-05724;

Siegel v. Hitachi, Ltd.,
No. 11-cv-05502;

Siegel v. Technicolor SA,
No. 13-cv-05261;

Best Buy Co., Inc. v. Hitachi, Ltd.,

) **DECLARATION OF TIFFANY B. GELOTT**
) **IN SUPPORT OF DEFENDANTS PHILIPS**
) **ELECTRONICS NORTH AMERICAN**
) **CORPORATION'S, PHILIPS TAIWAN**
) **LIMITED'S, AND PHILIPS DO BRASIL**
) **LTDA.'S REPLY IN SUPPORT OF**
) **MOTION FOR PARTIAL SUMMARY**
) **JUDGMENT**

) Date: February 6, 2015

) Time: 10:00 a.m.

) Place: Courtroom 1, 17th Floor

) Hon. Samuel P. Conti

No. 11-cv-05513;
Best Buy Co., Inc. v. Technicolor SA,
 No. 13-cv-05264;
Interbond Corp. of Am. v. Hitachi, Ltd.,
 No. 11-cv-06275;
Interbond Corp. of Am. v. Technicolor SA,
 No. 13-cv-05727;
Office Depot, Inc. v. Hitachi, Ltd.,
 No. 11-cv-06276;
Office Depot, Inc. v. Technicolor SA,
 No. 13-cv-05726;
CompuCom Sys., Inc. v. Hitachi, Ltd.,
 No. 11-cv-06396;
P.C. Richard & Son Long Island Corp. v.
Hitachi, Ltd.,
 No. 12-cv-02648;
P.C. Richard & Son Long Island Corp. v.
Technicolor SA,
 No. 13-cv-05725;
Schultze Agency Servs., LLC v. Hitachi, Ltd.,
 No. 12-cv-02649;
Schultze Agency Servs., LLC v. Technicolor SA,
 No. 13-cv-05668;
Tech Data Corp. v. Hitachi, Ltd.,
 No. 13-cv-00157;
Sears, Roebuck and Co. and Kmart Corp. v.
Technicolor SA,
 No. 13-cv-05262
Sears, Roebuck and Co. and Kmart Corp. v.
Chunghwa Picture Tubes, Ltd.,
 No. 11-cv-05514
Sharp Electronics Corp. v. Hitachi Ltd.,
 No. 13-cv-1173 SC
Sharp Electronics Corp. v. Koninklijke Philips

1 *Elecs., N.V.,*)
2 No. 13-cv-2776 SC)
3 *ViewSonic Corp. v. Chunghwa Picture Tubes,*)
4 *Ltd.,*)
5 No. 14-cv-2510 SC)
6 *All Indirect Purchaser Actions*)
7)
8)

1 I, Tiffany Gelott, declare and state as follows:

2 1. I am an attorney with Baker Botts LLP, attorneys for Philips Electronics North America
3 Corporation (“PENAC”), Philips Taiwan Limited (“PTL”), and Philips do Brasil, Ltda. (“PDBL”)
4 (collectively, the “Philips Subsidiaries”) in the above-captioned action. I am a member of the bar of
5 the District of Columbia and have been admitted to practice before this Court on this matter pro hac
6 vice. I make this declaration in support of the Philips’ Subsidiaries’ Reply in Support of Motion for
7 Partial Summary Judgment. The information contained herein is based on my own personal
8 knowledge, and if called as a witness I could, and would, testify competently that the matters set forth
9 herein are true.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Deposition of
11 Jim Smith (12/12/2013) (“Smith Dep.”).

12 3. Attached hereto as Exhibit 2 is a true and correct copy of the document bearing bates
13 number, PHLP-CRT-148288, that was produced in this litigation by Koninklijke Philips N.V
14 (“KPNV”) and PENAC.

15 4. Attached hereto as Exhibit 3 is a true and correct copy of the document bates numbers,
16 PHLP-CRT-150976 through PHLP-CRT-150977, that was produced in this litigation by KPNV and
17 PENAC.

18 5. Attached hereto as Exhibit 4 is a true and correct copy of the document bates numbers,
19 PHLP-CRT-149177 through PHLP-CRT-149179, that was produced in this litigation by KPNV and
20 PENAC.

21 6. Attached hereto as Exhibit 5 is a true and correct copy of the document bates numbers,
22 PHLP-CRT-064967 through PHLP-CRT-064968, that was produced in this litigation by KPNV and
23 PENAC.

24 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the Deposition of
25 Jan De Lombaerde (10/9/2014) (“Lombaerde Dep.”).

26 I declare under penalty of perjury that the foregoing is true and correct to the best of my
27 knowledge and information.
28

1 Executed on January 23, 2015 in Washington, D.C.

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3 /s/ Tiffany B. Gelott

4 Tiffany B. Gelott
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